

AB: GK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 2252(a)(2))

ALEXANDER MAYER,

19-308 M

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

MATTHEW D. DERAGON, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

In or about January 7, 2019 through April 4, 2019, within the Eastern District of New York and elsewhere, the defendant ALEXANDER MAYER did knowingly receive and distribute any visual depiction, the production of such visual depiction having involved the use of one or more minors engaging in sexually explicit conduct and such visual depiction was of such conduct, using any means or facility of interstate or foreign commerce or that has been mailed, or has been shipped or transported in or affecting interstate or foreign commerce or which contains materials which have been mailed or so shipped or transported, by any means including by computer.

(Title 18, United States Code, Section 2252(a)(2)).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I have been a Special Agent with the Federal Bureau of Investigation ("FBI") for approximately four years and have worked on numerous cases involving child exploitation. As a result, and based on my training and experience, I am familiar with the child pornography laws and how child pornography violations are commonly committed. I have been assigned to investigate violations of criminal law relating to the sexual exploitation of children, and I have gained expertise in how to conduct such investigations through, among other things, training I have received in seminars and classes, and my daily work in relation to these types of investigations. As part of my responsibilities, I have participated in numerous investigations into the distribution, possession, receipt and production of child pornography by electronic means and have reviewed thousands of photographs depicting children (less than 18 years of age) being sexually exploited by adults. Through my experience in these investigations, I have become familiar with the manner in which acts of sexual exploitation of children are committed and the methods of determining whether a child is a minor. I am a member of the Southern and Eastern Districts of New York Project Safe Childhood Task Forces, and have participated in the execution of multiple search warrants of physical premises, including apartments and other residential spaces. I

¹ Because this affidavit is submitted only to illustrate that probable cause exists to believe that the defendant committed certain crimes, all the facts known to me as a result of my investigation have not been included.

have also supervised and participated in the seizure of electronically stored information (“ESI”) in connection with the execution of those search warrants.

2. I have personally participated in the investigation of the offenses discussed below. I am familiar with the facts and circumstances of this investigation from my own personal participation in the investigation, my review of documents, images, and video evidence, my training and experience, and discussions I have had with other law enforcement personnel concerning the distribution, possession, receipt, production and proliferation of child pornography. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

3. Since on or about January 7, 2019, the FBI has been investigating an individual using Kik Messenger² username “alyz679” and Grindr³ account “Alex” connection with the possession and distribution of child pornography and the sexual exploitation of minor children through the use of the Internet. The investigation began when an undercover FBI agent who was posing as the step-father of a nine-year-old male child (the “UC”) was contacted by Grindr user “Alex.” Grindr user “Alex” stated, in sum and substance, that he was interested in “younger vids” and incest, and stated that he typically viewed videos containing such material in Telegram channels that he learned about from friends that he “was pervin with.” “Alex” further stated that his favorite video was of “a dad

² Kik Messenger (“Kik”) is an instant messaging application designed for use on smartphone devices.

³ Grindr is a social networking mobile application with, among other features, location-based proximity tracking technology and instant messaging capabilities.

and a few boys” ranging in age from “like 5 to 14.” Grindr’s proximity tracker indicated that “Alex” was approximately 6 miles from the UC’s Manhattan location.

4. Later on January 7, 2019, after establishing a mutual interest in child pornography, the UC provided a phone number to “Alex,” after which “Alex” contacted the UC by text message. During the conversation, “Alex” stated, in sum and substance, that approximately five years ago, “Alex” masturbated in front of “a curious 15 year old.” “Alex” further stated that he had watched “young videos” as recently as the prior week, and was attempting to receive videos from his friends.

5. During the same text message conversation, the UC told “Alex” that he had a 9-year-old stepson, after which “Alex” stated, “there’s nothing I want more than a smooth young boyhole” and “[s]orry I just came all over the place [thinking of] [f]ucking your stepson.” “Alex” stated he wanted to meet in person to further discuss engaging the 9-year-old in sex.

6. On February 11, 2019, “Alex” contacted the UC through his Grindr account to inform UC that he received over 100 videos of “some hot porn” of “all kinds” and “all [young].” “Alex” agreed to send a screenshot of the file’s to the UC’s Kik account. Using Kik account “alyz679,” “Alex” then sent a screen shot of his computer containing an open computer folder in which approximately 12 thumbnails of videos were displayed. The thumbnails included:

- a. two thumbnails, each containing a separate video file, that depict an adult finger penetrating the anus of a toddler male who is nude from the waist down;

- b. a thumbnail containing an image of an adult penis engaging a male, approximately 4 years old, in anal sex; and
- c. thumbnails depicting nude newborn children.

Some of the thumbnails are known to law enforcement agents based on their training and experience, and are classified as child pornography due to the sexual activity that occurs in the videos.

7. A review of a law enforcement database reveals that the phone number used by “Alex” corresponds to an individual who resides at 2121 Foster Avenue, Apartment 22, Brooklyn, NY 11210 (the “Premises”).

8. A review of social media identified a Facebook account under user name “Alexander Z Mayer” with a listed account holder phone number that matches the phone number that “Alex” used to contact the UC via text message. The “Alexander Z Mayer” Facebook account also lists an AOL Instant Messenger⁴ screenname of “alyz679”—the same screenname that “Alex” used to contact the UC on Kik. In addition, the profile picture for the Facebook account “Alexander Z Mayer” appears to depict the same person as the profile picture used by “Alex” on Grindr.

9. Based on my participation in this investigation, my conversations with other law enforcement agents, and information obtained from Kik Messenger and Optimum Online, I have learned, among other things, the following:

⁴ AOL Instant Messenger (“AIM”) is an instant messaging application designed for use on computer and smartphone devices.

- a. Kik Messenger account user “alyz679” used Internet Protocol (“IP”) address “24.185.114.32” (“the “Subject IP Address”) to communicate with the UC over Kik Messenger; and
- b. the Internet account using the Subject IP Address is registered to the Premises.

10. Based upon the above information, on April 2, 2019, the Honorable Roanne L. Mann signed a search warrant to search the Premises for evidence of child pornography and coercion and enticement of minors.

11. On April 4, 2019, at approximately 5:30 a.m., “Alex” contacted the UC through Grindr and invited him to come to his residence.


12. Later that day, at approximately 6:00 a.m., members of the FBI arrived at the Premises to execute the search warrant. During the execution of the search warrant, members of the FBI recovered 2 laptops and 2 cellular telephones. One of the laptops, when opened, immediately revealed a video of child pornography.

13. Members of the FBI have reviewed files on one of the laptops and have identified multiple images and videos of child pornography. Two of these files are described as follows:

- a. 4_5913469977117066334.mp4 is a 44 second video depicting an adult male masturbating over a mattress where an approximately 3-6 month old male infant is lying down. The adult male then orally penetrates the infant with his penis.
- b. 1_4940479225363693689.mp4 is a 2 minute video depicting an adult male and an approximately 1-2 year old male. In the video the adult fondles the

toddler's penis and penetrates the toddler's anus digitally and with his penis.

WHEREFORE, your deponent respectfully requests that the defendant ALEXANDER MAYER be dealt with according to law.


MATTHEW D. DERAGON
Special Agent
Federal Bureau of Investigation

Sworn to before me this
LTM day of April, 2019

THE HONORABLE ROANNE L. MANN
CHIEF UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK